

POLI, MOON & ZANE, PLLC.

Michael N. Poli (Bar No. 005461)
403 Hill Street
Reno, Nevada 89501
Telephone: (775) 229-8021
mpoli@pmzlaw.com

ABIR COHEN TREYZON SALO, LLP

Kevin M. Pollack, *Admitted Pro Hac Vice*
16001 Ventura Blvd., Suite 200
Encino, CA 91436
Telephone: (833) 228-7529
Facsimile: (424) 288-4368
kpollack@actslaw.com

Attorneys for Plaintiff

RESNICK & LOUIS, P.C.

Paul A. Acker (Bar No. 3670)
Bethany L. Kirkenir (Bar No. 13165)
8945 West Russell Road, Suite 330
Las Vegas, NV 89148
Telephone: (702) 997-3800
Facsimile: (702) 997-3800
packer@rlattorneys.com
bkirkenir@rlattorneys.com

*Attorneys for Defendant,
Penn-Star Insurance Company*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JOSEPH ZIMMERMAN, individually and as
Trustee of the ZIMMERMAN FAMILY
TRUST 1994,

Plaintiff,

vs.

PENN-STAR INSURANCE COMPANY,

Defendant.

CASE NO.: 2:22-cv-1174-JCM-MDC

**STIPULATION TO AMEND
SCHEDULING ORDER WITH
RESPECT TO DISCOVERY CUT-
OFF AND DISPOSITIVE MOTION
DEADLINES ONLY**

[This is the Parties' 5th extension]

Pursuant to Local Rule 26-3, Plaintiff Joseph Zimmerman, both individually and as Trustee of the Zimmerman Family Trust 1994 ("Plaintiff") and Defendant Penn-Star Insurance Company ("Defendant"), by and through their counsel (collectively, the "Parties") hereby stipulate and request this court extend the discovery cut-off and dispositive motion dates as follows:

///

///

Description	Current Deadline	New Deadline
Discovery cut-off	July 25, 2025	August 25, 2025
Dispositive Motions [Pursuant to Local Rule 26-1(b)(4), the deadline for filing dispositive motions is 30 days after the discovery cut-off date]	August 25, 2025	September 24, 2025

The Parties stipulate that all other deadlines as granted in the Court's Orders dated March 14, 2025 (Doc. 55) and May 8, 2025 (Doc. 57) remain the same.

The Parties are in need of additional time to complete discovery, including expert depositions for the following reasons:

1. Defendant inadvertently served additional discovery on Plaintiff's counsel at an old email address that Plaintiff's counsel no longer had access to. As a result, Plaintiff did not receive said discovery and requires additional time to provide responses. Additionally, Defendant will require a reasonable amount of time to review Plaintiff's responses and determine what, if any, additional depositions will be required.
2. In consideration of the availability of counsel and experts, the Parties require additional time to complete expert depositions.

///

///

1 The Parties completed initial expert designations on June 10, 2025 and will be completing
2 rebuttal expert disclosures on June 26, 2025.

3 Therefore, for the foregoing reason, the Parties respectfully request the Court grant an
4 extension of the discovery cut-off and dispositive motion dates as requested herein.

5
6
7
8 DATED: June 27, 2025

DATED: June 27, 2025

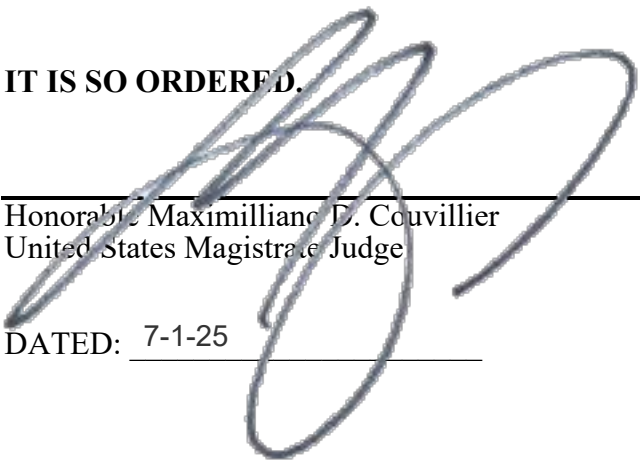
9
10 **RESNICK & LOUIS, P.C.**

**POLI, MOON, ZANE, PLLC &
ABIR COHEN TREYZON SALO, LLP**

11
12 By: //s// Paul A. Acker
13 PAUL A. ACKER, ESQ.
14 BETHANY L. KIRKENIR, ESQ.
*Attorneys for Defendant,
Penn-Star Insurance Company*

By: //s// Kevin M. Pollack
MICHAEL N. POLI, ESQ.
KEVIN M. POLLACK, ESQ.
Attorneys for Plaintiff

15
16
17 **IT IS SO ORDERED.**

18
19 
20 Honorable Maximilliano D. Couvillier
United States Magistrate Judge

21 DATED: 7-1-25
22
23
24
25
26
27
28